IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:

Applicant(s): Timothy P. O'Hagan

Serial No: 09/057,261

Filing Date: April 8, 1998

Examiner: David P. Knepper

Art Unit: 2654

Title: SPEECH RECOGNITION SYSEM TO MITIGATE MEMORY AND PROCESSING REQUIREMENTS IN A REMOTE DEVICE

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Arlington, VA 22313-1450

REPLY BRIEF

Dear Sir:

Applicant submits this reply brief in response to the Examiner's Answer mailed March 12, 2003.

REMARKS

The Barclay patent fails to teach or suggest a host computer communicating a GUI file to a mobile terminal, the GUI file having attached thereto a dictionary file having phonemes and a syntax file having allowable patterns of words being content specific to the graphical display file.

In the Examiner's Answer, the Examiner contended:

> The appellant's argument that col. 2, lines 9-29 fail to teach or suggest communicating phonemes from a host computer to a mobile terminal (page 4, paper #24) ignore the combination applied against the claims. The ability to transfer such information from a host computer (server) to a mobile terminal (a client computer) is clearly taught by the prior art in column 3, lines 9-11 of Barclay that indicates <u>the grammar is, in effect distributed and down loaded when a Web page for specific topics is entered</u>. (emphasis in original).

Appellants disagree. Barclay merely discloses that vocabularies and grammars can be downloaded. Barclay does not teach or suggest that phonemes are also communicated with the vocabularies and grammars. Rather, Barclay discusses a technology referred to as SAM that enables smart Web pages having downloadable grammar that is specific to syntax (e.g., words and phrases) to be executed on a client machine. SAM further requires that the speech recognizer software reside at the client machine. Accordingly, if phonemes are employed to reconstruct or decode spoken words or phrases at the client machine, such phonemes would be required to be stored on the client machine before the speech recognition could take place.

In contrast, the present invention communicates a dictionary file having phonemes and a syntax file having allowable patterns of words being content specific to a graphical display file. This mitigates having to store phonetic data at a remote device in order to decode patterns of speech related to the graphical display file. Thus, speed and accuracy of the present invention are substantially improved over conventional systems along with mitigating memory storage requirements of the remote device.

Because the Barclay patent does not teach or suggest every limitation set forth in the subject claims, Barclay does not make obvious such claims. Accordingly, a reversal of the rejection is respectfully requested.

CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited references. Accordingly, it is respectfully requested that the rejections of claims 1, 2, 4, 5, 8-18, 20, and 22 be reversed.

In the event any additional fees are due in connection with this paper, authorization to charge Deposit Account No. 50-1063 is hereby granted.

Respectfully submitted,
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